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October 14, 2020

**VIA ECF**

Hon. Jesse M. Furman, U.S.D.J.  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Argudo et al v. Parea Group LLC, et al* 18 CV 0678 (JMF)**

Dear Judge Furman,

We represent Plaintiffs and the Fed. R. Civ. P. Rule 23 class in the above-referenced matter. Together with counsel for all Defendants (except Parea Group LLC), we write to provide the Court with a status update on the bankruptcy stay in effect with respect to Defendant II Mulino USA, LLC ("IM USA"). *See* dkt. nos. 225, 227.

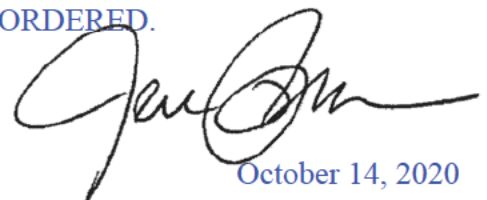
The Parties reached an agreement in principle with the chapter 11 debtor IM USA to stipulate to conditionally lift the automatic stay, subject to the bankruptcy court's approval, for the limited purpose of entering a judgment against IM USA at the Fairness Hearing in this matter. This will allow the class's claim against IM USA to be liquidated and treated as a general unsecured claim in the bankruptcy proceedings. At this time, bankruptcy counsel for IM USA is preparing the necessary paperwork to seek the bankruptcy court's approval of the stipulation and anticipate that the paperwork will be filed with the bankruptcy court within a week. Assuming the bankruptcy court approves the stipulation without issue, the Fairness Hearing will continue as originally anticipated in the Court's preliminary approval Order with IM USA's full participation in the settlement process as provided for in the stipulation. If there is any further need to update the Court with respect to this matter or if the Court so requests, the Parties will do so.

We thank the Court for its attention to this matter.

Respectfully submitted,

**JOSEPH & KIRSCHENBAUM LLP**

SO ORDERED.



October 14, 2020

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